

LAW OFFICES  
**BLOOSTON, MORDKOFKY, DICKENS, DUFFY & PRENDERGAST, LLP**  
2120 L STREET, NW  
WASHINGTON, DC 20037

(202) 659-0830  
FACSIMILE: (202) 828-5568

AFFILIATED SOUTH AMERICAN OFFICES

ESTUDIO JAUREGUI & ASSOCIATES  
BUENOS AIRES, ARGENTINA

EUGENE MALISZEWSKYJ  
ENGINEERING CONSULTANT

HAROLD MORDKOFKY  
BENJAMIN H. DICKENS, JR.  
JOHN A. PRENDERGAST  
GERARD J. DUFFY  
RICHARD D. RUBINO  
MARY J. SISAK  
D. CARY MITCHELL  
SALVATORE TAILLEFER

**June 30 2015**

ARTHUR BLOOSTON  
1914 - 1999

ORIGINAL

WRITER'S CONTACT INFORMATION  
sta@bloostonlaw.com  
202-828-5562

**REDACTED - FOR PUBLIC INSPECTION**

*VIA HAND DELIVERY*

*Received & Inspected*

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

**JUN 30 2015**

**FCC Mail Room**

RE: Form 481 - Carrier Annual Reporting Data Collection, 2015  
WC Docket No. 14-58

Dear Ms. Dortch:

Pursuant to sections 54.313(i) and 54.422(c) of the Commission's Rules,<sup>1</sup> MoKan Dial, Inc. (the Company) hereby submits a copy of its "FCC Form 481 - Carrier Annual Reporting Data Collection Form," as filed with the Universal Service Administrative Company. A copy is also being submitted to the appropriate state regulatory commission and tribal government, as further required by sections 54.313(i) and 54.422(c).

Pursuant to the Protective Order adopted by the Commission in this proceeding,<sup>2</sup> the Company requests confidential treatment for the financial information included in its report, as required by §54.313(f)(2), on the grounds that it is commercially sensitive information that is not normally released to the public. The Company also requests confidential treatment

Number of Copies rec'd 0 + 1  
List ABCDE

<sup>1</sup> 47 CFR §§54.313 and 54.422.

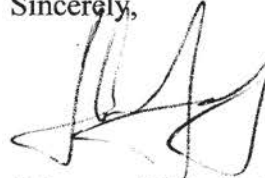
<sup>2</sup> In the Matter of Connect America Fund, et al., PROTECTIVE ORDER, WC Docket No. 10-90, et al., DA 15-712, released June 17, 2015.

Progress Report on the Five Year Service Quality Plan pursuant to sections 0.457 and 0.459 of the Commission's Rules. A letter in support of the Company's request is attached hereto.

In accordance with the Protective Order and the Commission's rules, two redacted copies and one non-redacted copy have been submitted on paper via hand delivery to the Secretary's Office, two non-redacted copies have been submitted for hand delivery to Mr. Charles Tyler of the Telecommunications Access Policy Division, and a redacted copy has also been filed via the Electronic Comment Filing System.

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to be 'Salvatore Taillefer, Jr.', written over a light blue horizontal line.

Salvatore Taillefer, Jr.

Counsel to MoKan Dial, Inc.

CC:

Mr. Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau

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**June 30, 2015**

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VIA HAND DELIVERY

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

RE: Form 481 – Carrier Annual Reporting Data Collection, 2015  
WC Docket No. 14-58

Dear Ms. Dortch:

Pursuant to §0.457 and §0.459 of the Commission's rules, MoKan Dial, Inc. (the "Company"), by its attorneys, hereby requests that certain materials and information be withheld from public inspection. Specifically, the Company requests confidential treatment of the Progress Report on the Five Year Service Quality Improvement Plan (the "Plan" or "confidential information") attached to its Form 481 filing.

In support of its request for confidential treatment and pursuant to the requirements under § 0.459(b) of the Commission's rules, the Company states the following:

*1. Identification of the specific information for which confidential treatment is sought.*

The Company seeks confidential treatment of the Progress Report on the Five Year Service Quality Improvement Plan, attachment 112 to the Form 481 filing accompanying this letter, which contains sensitive financial information about the Company as well as information about the Company's projected network improvements and upgrades for voice and broadband services during the period from 2015 through 2019.

2. *Identification of the Commission proceeding in which the information was submitted or description of the circumstances giving rise to the submission.*

The documents are being submitted as part of the annual Eligible Telecommunications Carrier Report (Form 481) mandated by section 54.313 of the Commission's rules.

3. *Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.*

The data described is highly confidential and sensitive commercial and financial information which constitutes trade secrets or sensitive commercial and financial information that "would customarily be guarded from competitors,"<sup>1</sup> and is therefore exempted from mandatory disclosure under FOIA Exemption 4 and Section 0.457(d) of the Commission's rules.<sup>2</sup>

4. *Explanation of the degree to which the information concerns a service that is subject to competition.*

The Plan relates to voice and broadband services provided by the Company that are subject to competition from competitive local exchange carriers, cable television system operators, electric power utilities, fixed and mobile wireless service providers, and/or satellite carriers.

5. *Explanation of how disclosure of the information could result in substantial competitive harm.*

Disclosure of the confidential information is likely to result in substantial competitive harm to the Company because the confidential information could provide competitors with commercially sensitive insights related to the Company's operations, service offerings, and costs.

6. *Identification of any measures taken by the submitting party to prevent unauthorized disclosure.*

The Company does not make the Progress Report on the Five Year Service Quality Improvement Plan or any of the information contained therein publically available in any way and further limits internal access to key employees subject to strict non-disclosure obligations.

7. *Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.*

The Company does not make the confidential information available to the public and it has not previously allowed disclosure of the confidential information to third parties that are not otherwise bound by confidentiality obligations.

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<sup>1</sup> *Id.* § 0.457(d)(2).

<sup>2</sup> 5 U.S.C. § 552(b)(4); 47 C.F.R. § 0.457(d).

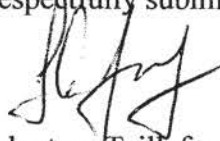
8. *Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.*

The confidential information should be treated as confidential for an indefinite period, as the Company will always be subject to competition and the competitive harms associated with the disclosure of the confidential information.

In order to provide adequate protection from public disclosure, the Commission should strictly limit distribution of the confidential information within the Commission on a "need to know" basis and not allow any distribution outside of the Commission. In the event that any person or entity outside the Commission requests disclosure of the confidential information, the Company requests that it be so notified immediately so that it can oppose such request or take other action to safeguard its interests as it deems necessary.

Please direct any questions regarding this submission to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Salvatore Taillefer, Jr.', written over a horizontal line.

Salvatore Taillefer, Jr.  
Counsel for  
MoKan Dial, Inc.



<b>FCC Form 481 - Carrier Annual Reporting</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3050-0084/OMB Control No. 3050-0519 July 2013
---	--

<010> Study Area Code	421807
<015> Study Area Name	HOKAN DIAL INC-MO
<020> Program Year	2016
<030> Contact Name: Person USAC should contact with questions about this data	Amanda Molina
<035> Contact Telephone Number: Number of the person identified in data line <030>	9044037533 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	amolina@townes.net

<b>ANNUAL REPORTING FOR ALL CARRIERS</b>	54.313 Completion Required	54.422 Completion Required
--	----------------------------------	----------------------------------

<100> Service Quality Improvement Reporting <span style="float: right;">(complete attached worksheet)</span>	✓	[diagonal lines]	(check box when complete)
<200> Outage Reporting (voice) <span style="float: right;">(complete attached worksheet)</span>	✓	✓	
<210> <input checked="" type="checkbox"/> ← check box if no outages to report	✓	[diagonal lines]	
<300> Unfulfilled Service Requests (voice) <input type="text" value="0"/>	[diagonal lines]	[diagonal lines]	
<310> Detail on Attempts (voice) <div style="border: 1px solid black; height: 40px; width: 100%;"></div> <span style="float: right;">(attach descriptive document)</span>	[diagonal lines]	[diagonal lines]	
<320> Unfulfilled Service Requests (broadband) <input type="text" value="0"/>	✓	[diagonal lines]	
<330> Detail on Attempts (broadband) <div style="border: 1px solid black; height: 40px; width: 100%;"></div> <span style="float: right;">(attach descriptive document)</span>	[diagonal lines]	[diagonal lines]	
<400> Number of Complaints per 1,000 customers (voice)			
<410> Fixed <input type="text" value="0.0"/>	✓	✓	
<420> Mobile <input type="text" value="0.0"/>			
<430> Number of Complaints per 1,000 customers (broadband)			
<440> Fixed <input type="text" value="0.0"/>	✓	[diagonal lines]	
<450> Mobile <input type="text" value="0.0"/>			
<500> Service Quality Standards & Consumer Protection Rules Compliance <span style="float: right;">(check to indicate certification)</span>	✓	✓	
<510> <div style="border: 1px solid black; height: 40px; width: 100%;"></div> <span style="float: right;">(attach descriptive document)</span>	✓	✓	
<600> Functionality in Emergency Situations <span style="float: right;">(check to indicate certification)</span>	✓	✓	
<610> <div style="border: 1px solid black; height: 40px; width: 100%;"></div> <span style="float: right;">(attach descriptive document)</span>	✓	✓	
<700> Company Price Offerings (voice) <span style="float: right;">(complete attached worksheet)</span>	✓	[diagonal lines]	
<710> Company Price Offerings (broadband) <span style="float: right;">(complete attached worksheet)</span>	✓	[diagonal lines]	
<800> Operating Companies and Affiliates <span style="float: right;">(complete attached worksheet)</span>	✓	✓	
<900> Tribal Land Offerings (Y/N)? <input type="radio"/> <input checked="" type="radio"/> <span style="float: right;">(if yes, complete attached worksheet)</span>	✓	[diagonal lines]	
<1000> Voice Services Rate Comparability Certification <span style="float: right;">Yes <input type="text" value=""/></span>	✓	[diagonal lines]	
<1010> <span style="float: right;">(attach descriptive document)</span>	[diagonal lines]	[diagonal lines]	
<1100> Certify whether terrestrial backhaul options exist (Yes or No) <input checked="" type="radio"/> <input type="radio"/> <span style="float: right;">(if not, check to indicate certification)</span>	✓	[diagonal lines]	
<1110> <span style="float: right;">(complete attached worksheet)</span>	[diagonal lines]	[diagonal lines]	
<1200> Terms and Condition for Lifeline Customers <span style="float: right;">(complete attached worksheet)</span>	[diagonal lines]	✓	
<b>Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet</b>			
Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers			
<2000> <span style="float: right;">(check to indicate certification)</span>	[diagonal lines]	[diagonal lines]	
<2005> <span style="float: right;">(complete attached worksheet)</span>	[diagonal lines]	[diagonal lines]	
<b>Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet</b>			
<3000> <span style="float: right;">(check to indicate certification)</span>	✓	[diagonal lines]	
<3005> <span style="float: right;">(complete attached worksheet)</span>	✓	[diagonal lines]	

(100) Service Quality Improvement Reporting  
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	421807
<015>	Study Area Name	HOKAN DIAL INC-MO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Amanda Molina
<035>	Contact Telephone Number - Number of person identified in data line <030>	9044037533 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	amolina@townes.net
<110>	Has your company received its ETC certification from the FCC?	(yes / no) <input type="radio"/> <input checked="" type="radio"/>
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no) <input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

421807mo112.pdf

- <112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets  
 <114> Report how much universal service (USF) support was received  
 <115> How much (USF) was used to improve service quality and how support was used to improve service quality  
 <116> How much (USF) was used to improve service coverage and how support was used to improve service coverage  
 <117> How much (USF) was used to improve service capacity and how support was used to improve service capacity  
 <118> Provide an explanation of network improvement targets not met in the prior calendar year.

Yes
Yes
Yes
Yes
Yes
Yes

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(200) Service Outage Reporting (Voice)  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	421807
<015>	Study Area Name	MOKAN DIAL INC-WO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Amarda Molina
<035>	Contact Telephone Number - Number of person identified in data line <030>	9044037533 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	amolina@townes.net

[illegible]

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(700) Price Offerings Including Voice Rate Data  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	421807
<015>	Study Area Name	WOXON DIAL IJC-MO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Amanda Molina
<035>	Contact Telephone Number - Number of person identified in data line <030>	9044037533 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	amolina@towmes.net

<701>	Residential Local Service Charge Effective Date	1/1/2015
<702>	Single State-wide Residential Local Service Charge	

[illegible]

REDACTED - FOR PUBLIC INSPECTION

REDACTED - FOR PUBLIC INSPECTION

<010>	Study Area Code	421807
<015>	Study Area Name	MOYAN DIAL INC-MO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Amade Molina
<035>	Contact Telephone Number - Number of person identified in data line <030>	9044037533 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	amolinas@townes.net

[illegible]

(800) Operating Companies  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	421807
<015>	Study Area Name	MOKAN DIAL INC-MO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Amanda Molina
<035>	Contact Telephone Number - Number of person identified in data line <030>	9044037533 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	amolina@townes.net
<810>	Reporting Carrier	Mokan Dial, Inc. - Missouri
<811>	Holding Company	Townes Telecommunications, Inc.
<812>	Operating Company	Mokan Dial, Inc. - Missouri

[illegible]

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REDACTED - FOR PUBLIC INSPECTION

(900) Tribal Lands Reporting  
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010> Study Area Code 421807  
 <015> Study Area Name NOKAN DIAL INC-MO  
 <020> Program Year 2016  
 <030> Contact Name - Person USAC should contact regarding this data Amanda Molina  
 <035> Contact Telephone Number - Number of person identified in data line <030> 9044037533 ext.  
 <039> Contact Email Address - Email Address of person identified in data line <030> amolina@townes.net

&lt;910&gt; Tribal Land(s) on which ETC Serves

--

&lt;920&gt; Tribal Government Engagement Obligation

--

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor Institutions.  
 <922> Feasibility and sustainability planning;  
 <923> Marketing services in a culturally sensitive manner;  
 <924> Compliance with Rights of way processes  
 <925> Compliance with Land Use permitting requirements  
 <926> Compliance with Facilities Siting rules  
 <927> Compliance with Environmental Review processes  
 <928> Compliance with Cultural Preservation review processes  
 <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

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**(1100) No Terrestrial Backhaul Reporting  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	421807
<015>	Study Area Name	MOKAN DIAL, INC-MO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Amanda Molina
<035>	Contact Telephone Number - Number of person identified in data line <030>	9044037533 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	amolina@townes.net

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

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REDACTED - FOR PUBLIC INSPECTION



**(1200) Terms and Condition for Lifeline Customers****Lifeline****Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	421807
<015>	Study Area Name	MOKAN DIAL INC-MO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Amanda Molina
<035>	Contact Telephone Number - Number of person identified in data line <030>	9044037533 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	amolina@cowmes.net

421807mo1210.pdf

&lt;1210&gt; Terms &amp; Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

&lt;1220&gt; Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

&lt;1221&gt; Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,



&lt;1222&gt; Details on the number of minutes provided as part of the plan,



&lt;1223&gt; Additional charges for toll calls, and rates for each such plan.



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(3000) Rate Of Return Carrier Additional Documentation (Continued)		FCC Form 481
Data Collection Form		OMB Control No. 3060-0945/OMB Control No. 3060-0815
		July 2013

<010> Study Area Code	421807
<015> Study Area Name	MOKAN DIAL TNC-MO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Aranda Molina
<035> Contact Telephone Number - Number of person identified in data line <030>	9044037533 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	amolina@townes.net

Financial Data Summary

(3027) Revenue	[REDACTED]
(3028) Operating Expenses	[REDACTED]
(3029) Net Income	[REDACTED]
(3030) Telephone Plant In Service(TPIS)	[REDACTED]
(3031) Total Assets	[REDACTED]
(3032) Total Debt	[REDACTED]
(3033) Total Equity	[REDACTED]
(3034) Dividends	[REDACTED]

REDACTED - FOR PUBLIC INSPECTION

REDACTED - FOR PUBLIC INSPECTION

Name of Attached Document Listing Required Information

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3050-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	421807
<015> Study Area Name	NOKAN DIAL INC-MO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Amanda Molina
<035> Contact Telephone Number - Number of person identified in data line <030>	9044037533 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	amolina@townes.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: NOKAN DIAL INC-MO	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/20/2015
Printed name of Authorized Officer: Deborah Nobles	
Title or position of Authorized Officer: VP of Regulatory Affairs	
Telephone number of Authorized Officer: 9042590029 ext.	
Study Area Code of Reporting Carrier: 421807	Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form		FCC Form 481 OMB Control No. 3050-0986/OMB Control No. 3050-0819 July 2013
<010> Study Area Code	421807	
<015> Study Area Name	MOKAN DIAL, INC-MO	
<020> Program Year	2016	
<030> Contact Name - Person USAC should contact regarding this data	Amanda Molina	
<035> Contact Telephone Number - Number of person identified in data line <030>	9044037533 ext.	
<039> Contact Email Address - Email Address of person identified in data line <030>	amolina@townes.net	

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: _____	
Name of Reporting Carrier: _____	
Signature of Authorized Officer: _____	Date: _____
Printed name of Authorized Officer: _____	
Title or position of Authorized Officer: _____	
Telephone number of Authorized Officer: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: _____	
Name of Authorized Agent or Employee of Agent: _____	
Signature of Authorized Agent or Employee of Agent: _____	Date: _____
Printed name of Authorized Agent or Employee of Agent: _____	
Title or position of Authorized Agent or Employee of Agent: _____	
Telephone number of Authorized Agent or Employee of Agent: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

REDACTED - FOR PUBLIC INSPECTION

### Attachments

REDACTED - FOR PUBLIC INSPECTION



LINE 112: PROGRESS REPORT

**REDACTED IN ENTIRETY**

Carrier Name: MoKan Dial, Inc. - Missouri  
Carrier SPIN: 143002299  
Carrier SAC: 421807  
Operating State: Missouri

Line 510: Service Quality Standards and Consumer Protection Rules Compliance for voice and broadband services

MoKan Dial, Inc. ("MoKan" or "the Company") continues to comply with the Quality of Service Standards and Objectives established in the following rules in the Missouri Code of State Regulations ("CSR"):

4 CSR 240-32.070 Quality of Service  
4 CSR 240-32.080 Service Objectives and Surveillance Levels

MoKan complies with the following federal consumer protection rules and regulations:

FCC 47 C.F.R. §§64.2001-64.2011 – Customer Proprietary Network Information ("CPNI")  
FTC 16 C.F.R. §681.2 – Identity Theft Red Flags and Address Discrepancies Under the Fair and Accurate Credit Transactions Act of 2003

All customer protection and disclosures established by the Fair Credit Reporting Act (15 U.S.C. §§1681, *et seq.*) and the Truth in Lending Act (15 U.S.C. §§1601, *et seq.*)

The Company has a CPNI Policy Manual detailing and enforcing the requirements of the federal CPNI rules. Each year, the CPNI Compliance Officer (1) communicates with the Company's attorneys and/or consultants regarding CPNI responsibilities, requirements and restrictions; (2) supervises the training of Company employees and agents who use or have access to CPNI; (3) supervises the use, disclosure, distribution or access to the Company's CPNI by independent contractors and joint venture partners; (4) maintains records regarding the use of CPNI in marketing campaigns; and (5) receives, reviews and resolves questions or issues regarding use, disclosure, distribution or provision of access to CPNI. The CPNI Compliance Officer certifies compliance annually with the FCC by March 1.

The Company has an Identity Theft Prevention Program ("the Program") that was approved by the Board of Directors in September 2008. The Board appointed Red Flag Coordinator is responsible for updating the Program as necessary; the day-to-day supervision of the Program; training Company employees regarding their responsibilities with respect to the Program; and responding to employee questions and concerns regarding identity theft or the Program. The Red Flag Coordinator is required to annually prepare an Identity Theft Prevention Program Compliance Report for the Board's approval by October 1. The Identity Theft Prevention Program Compliance Report evaluates the effectiveness of the Program; the nature and extent of the Company's service provider arrangements and their impact on the effectiveness of the Program; reports any significant incidents involving identity theft and the Company's response to such incidents; and provides recommendations to the Board for periodic reviews of the Program and the adoption of material changes and other revisions, modifications and updates to the Program.

The Company is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3.

Carrier Name: MoKan Dial, Inc. - Missouri  
Carrier SPIN: 143002299  
Carrier SAC: 421807  
Operating State: Missouri

Line 610: " Functionality in Emergency Situations for voice and broadband services

MoKan Dial, Inc. ("MoKan" or "the Company") has an Emergency Operations Plan ("EOP" or "the Plan") that addresses the requirements for continuity of service and systematic restoration of service after loss of service due to an emergency. The EOP is administered and maintained by a member of senior management of the parent company, Townes Telecommunications, Inc., and is reviewed annually to ensure that each applicable section is accurate and any changes or updates to the Plan are made on a timely basis.

An Emergency Director has been authorized to implement the provisions of the EOP. The Emergency Director conducts training with employees and is responsible for ensuring that all new employees are provided a 30 minute overview of the Plan as part of their orientation. Specific supervisory personnel receive additional intense instructions regarding special areas of the Plan.

The Plan established an Emergency Committee made up of senior management and key company personnel, who upon notification by the Emergency Director that a potential emergency exists, convene to declare an emergency, notify affected parties and assume control of restoration of service efforts.

An emergency control center is established at the Company's business office, which is equipped with a back-up power generator and a wireless telephone set. Depending upon the severity and type of emergency and the safety of the emergency location, a control center may be established at the site of the event.

In case of power outages, batteries in the central office will last on average from 4-8 hours depending on how many lines (AMP load) are served at that particular location. The stand-by generator has 24 hour diesel capacity and small generators are available to be put on smaller concentrators if power is lost. The small generators have to be refueled every few hours.

The Company's standby generators and battery back-up support both voice and broadband network equipment should an emergency situation occur.

(700) Price Offerings Including Voice Rate Data  
Data Collection Form

FCC Form 481

OMB Control No. 3060-0985/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	421807
<015>	Study Area Name	MOKAN DIAL INC-MO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Amanda Molina
<035>	Contact Telephone Number - Number of person identified in data line <030>	9044037533 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	amolina@twowest.net

<701> Residential Local Service Charge Effective Date  
<702> Single State-wide Residential Local Service Charge

1/2/2015

&lt;703&gt;

[illegible]

REDACTED - FOR PUBLIC INSPECTION

REDACTED - FOR PUBLIC INSPECTION